

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

Teal Peak Capital, LLC;

Plaintiff and Counter Defendant,

And

John Michael Grzan And Namrata
Khimani

Counter Defendant,

v.

Alan Bram Goldman;

Defendant.

Civil No. 3:20-cv-1747

Breach of Contract; Specific
Performance of Contract;
Reimbursement of Funds, Costs
And Expenses

MOTION TO WITHDRAW AS COUNSEL OF RECORD AND CONTINUANCE OF TRIAL

TO THE HONORABLE COURT:

COME NOW the undersigned counsel, who have represented defendant Alan Bram Goldman ("Mr. Goldman"), as his counsel of record in this case, and request leave to withdraw and allow 30 days for Mr. Goldman to announce new counsel. Additionally, Mr. Goldman requests the continuance the bench trial scheduled for May 1, 2023, through May 4, 2023, and May 8, 2023.

Yesterday, Sunday, March 26, 2023, Mr. Goldman asked the undersigned to withdraw as counsel as soon as possible so that he could seek other legal representation. This morning, Mr. Goldman asked that we also move for a continuance of the bench trial. Since January 9, 2023, Mr. Goldman has been informed of the April 1st deadline to provide the Court with the evidence

binder and the trial schedule. Further, on March 16, 2023, the undersigned informed Mr. Goldman of the Pretrial Procedure Order entered by this Court in Docket No. 143.

WHEREFORE, the undersigned counsel respectfully request that the Honorable Court authorize their withdrawal as counsel of record for Mr. Goldman in the above-captioned case, continue the bench trial, and allow Mr. Goldman 30 days to announce new legal representation.

WE HEREBY CERTIFY that we have electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to all counsel of record.

Respectfully submitted in San Juan, Puerto Rico, this 27th day of March, 2023.

MCCONNELL VALDÉS LLC

270 Muñoz Rivera Ave.
Hato Rey, PR 00918
P.O. Box 364225
San Juan, PR 00936-4225
Tel. (787) 250-5604
Fax. (787) 759-8282

s/Antonio A. Arias-Larcada

Antonio A. Arias-Larcada
USDC-PR 204906
aaa@mcvpr.com

s/José A. Irizarry-Castro

José A. Irizarry-Castro
USDC-PR 308803
jic@mcvpr.com